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July 16, 2024

VIA ECF

Hon. Sarah Netburn, U.S.M.J.
United States District Court
Southern District of New York
40 Foley Square, Room 430
New York, NY 10007

Re: *Arthur Balder v. Susan Sarandon, et al*, Case No.: 1:22-cv-06401-JLR-SN

Hon. Judge Netburn:

We represent Defendants Susan Sarandon, Honey Shara, David Shara and Tigran Tsitoghdzyan (collectively, “Defendants”) in this action. This letter motion is submitted pursuant to Sections I(B) and (G) of Your Honor’s Individual Practices in Civil Cases. We write to respectfully request an extension of time to (a) file a motion to enforce the settlement agreement; and/or (b) file responses to the other party’s objections to the Court’s December 18, 2023, Report and Recommendation from July 25, 2024, to August 2, 2024.

The parties currently have until July 25, 2024, to (a) file a motion to enforce the settlement agreement; and/or (b) file responses to the other party’s objections to the Court’s December 18, 2023, Report and Recommendation. [Dkt. No. 143]. However, when the deadlines were initially discussed at the June 18, 2024, settlement conference (the “Settlement Conference”), the parties agreed on setting the deadline for August 2, 2024. The parties agreed to this date after I explained that I would be away on pre-planned vacation at the end of June and had several depositions already scheduled throughout July.

For this reason, we respectfully ask for the deadline for the parties to (a) file a motion to enforce the settlement agreement; and (b) file responses to the other party’s objections to the Court’s December 18, 2023, Report and Recommendation be extended from July 25, 2024, to the originally agreed upon date of August 2, 2024. This is the first request for an extension. Plaintiff consents to the extension.

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We greatly appreciate your Honor's time and consideration in this matter, and should the Court need any further information we are happy to provide such and are available at the Court's convenience.

Respectfully Submitted,

ADELMAN MATZ P.C.

A handwritten signature in black ink, appearing to be 'SM' with a colon, representing Sarah M. Matz.

Sarah M. Matz Esq.

Cc. Arthur Balder (via ECF pursuant to Court Authorization)